



United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.
Washington, D.C. 20240

DEC 1 2010

Re: Salt Lake City Public Library/ O.C. Tanner Flagship Renovation, 15 South State Street,
Salt Lake City, Utah

Project Number: 24142

Dear

I have concluded my review of your appeal of the decision of the National Park Service's Technical Preservation Services (TPS) denying certification of the rehabilitation of the property cited above. The appeal was initiated and conducted in accordance with Department of the Interior regulations (36 CFR Part 67) governing certifications for Federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I thank

for meeting with me in Washington on November 9, 2010, and for providing a detailed account of the project.

After careful review of the complete record for this project, I have determined that the rehabilitation of the former Salt Lake City Public Library is not consistent with the historic character of the property and that the project does not meet Standard 2 of the Secretary of the Interior's Standards for Rehabilitation. Therefore, the denial issued on March 18, 2010, by TPS is hereby affirmed.

Built in 1905, and enlarged in 1918, the Salt Lake City Public Library was designed by the architects Hines and LaFarge of New York City, who also designed the Cathedral of St. John the Divine. The Beaux Arts building served until 1964 as the principal public library for Salt Lake City. In 1965, the building was significantly altered and enlarged to become the Mr. and Mrs. George T. Hansen Planetarium, Space Science Library, and Museum. At that time, both the original 1905 and 1918 book stacks were demolished, leaving only their exterior north and south walls still standing, incorporated into a large new addition to house the planetarium itself. Also at that time, a new mezzanine floor was inserted into the former auditorium space on the second floor, above the main reading room. The building was individually listed in the National Register of Historic Places on August 7, 1979, in recognition of its significance in architecture, education, and social and humanitarian history.

TPS found that the completed rehabilitation of this "certified historic structure" did not to meet the Secretary of the Interior's Standards for Rehabilitation owing to the demolition of the original book stacks, as well as the 1918 enlargement at the rear. Also cited by TPS were the removal of the wall that formerly separated the reading room from the book stacks and the construction of a new wall at the rear of the diminished structure with an appearance deemed incompatible with the building's historic character. On the interior, TPS cited the removal of the ceiling from the ground floor and the insertion of a new circular stair extending to the top floor.

After careful review of the entire record of the rehabilitation, I have determined that the 1965 demolition of the book stacks to accommodate the new planetarium was so extensive as to cause an almost complete loss of its historic character and integrity. Consequently, I find that the demolition of the two remaining wall fragments of the book stacks does not further impair the historic character of the property. In addition, I find that the demolition of the 1965 addition does not impair the historic character of the property. Accordingly, the demolition of the remaining two wall fragments of the book stacks and of the 1965 addition has not entered into my decision.

The records also reveal that several of the changes to the property that TPS found objectionable, notably the new rear façade and the new circular stairway in the center of the first floor, were design solutions to allow the building to meet contemporary building code requirements. With regard to the rear wall, seismic performance requirements required shear walls along both the north-south and east-west axes of the building. The shear wall along the north-south axis was constructed in two segments in alignment with the original rear wall of the main block of the library building, each extending approximately one-fourth of the distance between the north and south facades. A new two-story glass curtain wall was constructed between the new shear walls, with an accessible entrance from the small parking lot at the rear of the property. At the third floor level, the rear wall and lower section of the roof were reconstructed based on photographic evidence and detailed to match adjacent historic features. With regard to the other facades of the building, the interior trim and inner wythe of brick was removed, seismic strengthening inserted, and the interior trim reinstalled so that there is little visible change to the interior. With regard to the new circular stair, it is the primary egress from the building, allowing the two historic stairs in the vestibule to be restored rather than converted into fire stairs.

Although I agree with TPS that the changes at the rear of the building create a dramatically different appearance from the Beaux Arts detailing of the other three facades, I note that the original book stack wing and 1918 addition were always more utilitarian in appearance, being essentially a service wing. In addition, the rear of the property is completely enclosed by taller buildings, two of which are parking garages. Consequently, given the unique conditions and circumstances at the rear of the building, I find that the new rear façade does not significantly compromise the historic character of the exterior of the former library.

In contrast, the changes to the historic character of the interior of the building are more extensive and more significant than the changes to the exterior. Historically the rear wall of the first floor reading room and the second floor auditorium was blank, penetrated only by two doors on each floor providing access into the book stacks beyond. That wall is now a glass curtain wall, imparting a dramatic change in character. With regard to the new circular stair, I note that there had been a similarly-sized circular opening in the 1965—thus non-historic—mezzanine floor. However, the first floor reading room, albeit altered when the library was converted for use as the planetarium, retained its original volume, with its iron columns and beams intact, at the beginning of the rehabilitation. As part of the seismic upgrading, both the original second floor and 1965 mezzanine floor were significantly strengthened and, as a result, are thicker than the replaced floor structure. In the main reading room, new round column capitals were fabricated at a lower height than the original rectangular column capitals and the visible beams were eliminated, creating an unbroken ceiling plane in contrast to its historic configuration. The new circular stair is an imposing presence in the former reading room. Even though the new stair is lightly framed and thus relatively transparent, its location in the center of the former reading room makes it an unavoidably prominent new feature. Combined with the new glass curtain wall and altered ceiling, the changes to the interior of the historic reading room are dramatic and severely diminish the character of the space. To a lesser degree, the second floor is similarly affected.

As a result, I find that the extensive changes made to the interior of the former Salt Lake City Public Library cause the overall impact of the rehabilitation to contravene Standard 2 of the Secretary of the Interior's Standards for Rehabilitation, found at 36 CFR § 67.7. Standard 2 states: "*The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.*" Consequently, I affirm the denial of rehabilitation certification issued by TPS on March 18, 2010.

Finally, I note that this project has many positive attributes, especially in the restoration of the original exterior features. It is unfortunate that the rehabilitation proceeded in advance of review and approval from the National Park Service. This is regrettable because it is the experience of the National Park Service that properties like this former library can be rehabilitated in a manner that accords with their historic character. Although owners are free to proceed in advance of National Park Service approval, the program regulations state that, "*Owners who undertake rehabilitation projects without prior approval from the Secretary do so strictly at their own risk.*" [36 CFR § 67.6(a)(1).]

As Department of the Interior regulations state, my decision is the final administrative decision with respect to the March 18, 2010, denial that TPS issued regarding rehabilitation certification. A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Burns", with a stylized flourish at the end.

John A. Burns, FAIA
Chief Appeals Officer
Cultural Resources

cc: SHPO-UT
IRS